

Exhibit “A”

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

Index No. 511956/21

MARY LAURENCIN,

Plaintiff designates Kings
County as the place of trial.

Plaintiff,

The basis of venue is
plaintiff's residence.

-against-

KOHL'S, INC.,

SUMMONS

Defendant.

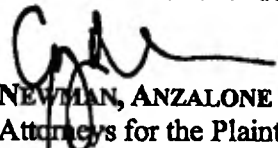
Plaintiff resides in Kings
County, State of New York

COUNTY OF KINGS

To the above named Defendant(s):

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: May 20, 2021


NEWMAN, ANZALONE & NEWMAN, LLP
Attorneys for the Plaintiff
Office and Post Office Address
95-25 Queens Boulevard
11th Floor
Rego Park, New York 11374

DEFENDANT'S ADDRESS:

KOHL'S, INC.
c/o Secretary of State
Albany, NY

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

MARY LAURENCIN,

Plaintiff,

Index No.: 511956/21

-against-

**VERIFIED
COMPLAINT**

KOHL'S, INC.,

Defendant.

Plaintiff, **MARY LAURENCIN**, through her attorneys, Newman, Anzalone & Newman, LLP, as and for her Verified Complaint, states as follows upon information and belief:

1. That at all times mentioned herein, Plaintiff was and still is a resident of the County of Kings, City and State of New York.

2. Upon information and belief, and at all times herein mentioned, the Defendant, **KOHL'S, INC.**, was and still is a domestic corporation organized and existing by virtue of the laws of the State of New York.

3. Upon information and belief, and at all times herein mentioned, the Defendant, **KOHL'S, INC.**, was and still is a foreign corporation authorized to do business in the State of New York.

4. Upon information and belief, and at all times herein mentioned, the Defendant, **KOHL'S, INC.**, was and still is a partnership doing business in the State of New York.

5. Upon information and belief, and at all times herein mentioned, the Defendant, **KOHL'S, INC.**, was and still is a business entity transacting business in the State of New York.

6. That upon information and belief, and at all times herein mentioned, the Defendant, **KOHL'S, INC.**, was a lessee of the premises located at 6111 188th Street, in the County of Queens, City and State of New York, pursuant to a lease agreement.

7. That upon information and belief, and at all times herein mentioned the Defendant, **KOHL'S, INC.**, operated a business, and more particularly a department store open to the general public at the aforementioned premises.

8. That upon information and belief, and at all times herein mentioned, the Defendant, **KOHL'S, INC.**, possessed the aforementioned business premises.

9. That upon information and belief, and at all times herein mentioned, the aforementioned business premises was under the control of the Defendant, **KOHL'S, INC.**, by its agents, servants and/or employees.

10. That upon information and belief, and at all times herein mentioned, the aforementioned business premises was under the management of the Defendant, **KOHL'S, INC.**, by its agents, servants and/or employees.

11. That upon information and belief, and at all times herein mentioned, the aforementioned business premises was under the maintenance of the Defendant, **KOHL'S, INC.**, by its agents, servants and/or employees.

12. That on the 27th day of July, 2018, while Plaintiff, **MARY LAURENCIN**, was lawfully shopping within the Defendant's business premises located at 6111 188th Street, in the County of Queens, City and State of New York, and using due care for her safety, she was caused to trip and fall over a defective, improperly placed and/or improperly maintained clothing display and/or other obstruction(s) existing upon the floor of the aforesaid business premises, thereby causing Plaintiff to sustain severe injuries as herein set forth.

13. That at all times herein mentioned it was the duty of the Defendant, to properly place and maintain the all display(s) within its business premises, so as not to cause or create any dangerous and/or hazardous conditions to persons shopping within said store premises and more particularly the Plaintiff, **MARY LAURENCIN**.

14. That the Defendant was at all times under a duty to provide the Plaintiff with a safe place to shop within the premises.

15. That at all times mentioned herein, the Plaintiff, **MARY LAURENCIN**, was a patron in the aforesaid store premises at the invitation of the Defendant herein.

16. That upon information and belief, the Defendant, its agents, servants, and employees had both actual and constructive notice of the dangerous condition alleged herein.

17. That said accident and the injuries resulting to the Plaintiff therefrom were caused solely and wholly by reason of the negligence, carelessness, and recklessness of the Defendant, and/or its agents, servants and/or employees, with no negligence on the part of the Plaintiff contributing thereto.

18. That at all times mentioned herein, the clothing display at issue herein was in the exclusive custody and/or control of the Defendant, its agents, servants, and/or employees.

19. That at all times mentioned herein, the Plaintiff's injuries would not have occurred if reasonable care had been used by the Defendant.

20. By reason of the foregoing, Plaintiff, **MARY LAURENCIN**, was rendered sick, sore, lame and disabled, and suffered severe, painful and permanent injuries to various parts of Plaintiff's person with accompanying pain, that Plaintiff continues to be sick, sore, lame and disabled, she has been incapacitated and has expended and become obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering. She was unable and continues to be unable for some time to come, to pursue her usual duties and daily activities, all to her damage.

WHEREFORE, Plaintiff, **MARY LAURENCIN**, has sustained injuries and damages in a sum greater than the jurisdictional limits of any lower court and as such, demands judgment on all causes of action stated herein against the Defendants.

Dated: Rego Park, New York
May 20, 2021

Yours, Etc.


NEWMAN, ANZALONE & NEWMAN, LLP

By **GREGORY S. NEWMAN, ESQ.**

Attorneys for Plaintiff

95-25 Queens Boulevard, 11th Floor

Rego Park, NY 11374

(718) 896-2700

File No. 18-190

ATTORNEY'S VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF QUEENS)

I, GREGORY S. NEWMAN, ESQ., an attorney admitted to practice in the courts of New York State, state:

I am a member of the firm, **NEWMAN, ANZALONE & NEWMAN, LLP**, the attorneys of record for the Plaintiff in the within action; I have read the foregoing **SUMMONS AND VERIFIED COMPLAINT** and know the contents thereof; and the same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters I believe it to be true. The reason this verification is made by me and not by the Plaintiff is that the Plaintiff resides outside the county wherein I maintain office.

The grounds of my belief as to all matters not stated upon my own knowledge are as follows: information gathered in my file.

I am over 18 years of age, I am not a party to the action, and I reside in Suffolk County in the State of New York.

Dated: Rego Park, New York

May 20, 2021



GREGORY S. NEWMAN, ESQ.